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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

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OFFICE OF  
PESTICIDES AND TOXIC  
SUBSTANCES

MEMORANDUM

SUBJECT: Review Of Labeling And Data Tables For New Use  
Of Touchdown Herbicide In Vineyards And Non-  
bearing Fruit And Nut Orchards.

FROM: James W. Akerman, Chief  
Ecological Effects Branch  
Environmental Fate and Effects Division (H7507C)

TO: Cynthia Giles, PM 25  
Herbicide/Fungicide Branch  
Registration Division (H7505C)

The proposed labels for use of sulfosate (Touchdown Concentrate, and Touchdown 6) herbicide in vineyards and non-bearing fruit and nut orchards have been reviewed. Based on a review of EEB files, there are no data requirements outstanding.

Previous EEC calculations for sulfosate were based on a maximum label rate of 4 lb. active ingredient per acre per year. The proposed sulfonate labels for vineyards and non-bearing fruit and nut orchards disallow the use of more than 4 lb. active ingredient per acre per year.

The proposed sulfosate labels (Touchdown Concentrate and Touchdown 6) have the statements "Do not apply to any body of water, wetlands, or other aquatic habitats." Statements regarding "wetlands" are no longer allowed on labels by EEB because of definition conflicts with other federal agencies. Instead, the following statement is now used: "Do not apply directly to water or to areas where surface water is present, or to intertidal areas below the mean high water mark."